

## **EXHIBIT 2**

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING  
PHARMACY, INC. PRODUCTS LIABILITY  
LITIGATION

THIS DOCUMENT RELATES TO:

## All Suits Against the Saint Thomas Entities

MDL No. 2419  
Dkt. No 1:13-md-2419 (RWZ)

**SAINT THOMAS ENTITIES' NOTICE OF TAKING VIDEOTAPED DEPOSITIONS  
DUCES TECUM OF BELLWETHER CANDIDATE PLAINTIFF ADAM ZIEGLER AND  
PLAINTIFF SARAH ZIEGLER**

The Saint Thomas Entities,<sup>1</sup> pursuant to Federal Rule of Civil Procedure 30, come now and give notice that the oral and videotaped deposition of Bellwether Candidate Plaintiff Adam Ziegler will be taken on December 14, 2015 beginning at 9:00 a.m. CST and continuing until completed. The deposition of Plaintiff Sarah Ziegler will commence immediately thereafter and will continue until completed. The depositions will take place at Lieff, Cabraser, Heimann & Bernstein, 150 Fourth Avenue North, Suite 1650, Nashville, TN 37219-2417. The depositions will be recorded by stenographical means and by video. Please see Attachment A for documents to be produced at the time of deposition.

<sup>1</sup> Saint Thomas West Hospital f/k/a St. Thomas Hospital; Saint Thomas Health; and Saint Thomas Network.

Dated: November 30, 2015

SAINT THOMAS HEALTH, SAINT  
THOMAS NETWORK, and SAINT  
THOMAS WEST HOSPITAL

By their attorneys,

/s/ Sarah P. Kelly  
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**CERTIFICATE OF SERVICE**

I certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing this 30th day of November, 2015.

/s/ Sarah Kelly

Sarah P. Kelly

**ATTACHMENT A**

You are requested to appear at the time of deposition with the following documents that are you in your personal possession, custody, and control:

1. All bills, receipts, statements, statements of account, canceled checks, or other documents of any description that evidence any medical expenses that you are claiming as damages in this case.

2. All bills, receipts, statements, statements of account, canceled checks, or other documentation of any description that evidence any out-of-pocket expenses that you are claiming as damages in this case.

3. All notes, memoranda, diaries, journals or other writing of any kind prepared or maintained by you or any of your family members that concern the physical, mental, or emotional conditions that are alleged injuries that are the subject matter of this lawsuit.

4. All documents concerning any reimbursement you received for expenses that you are claiming in this lawsuit, including without limitation health insurance payments, temporary disability payments, or unemployment payments.

5. Copies of any and all documentation, correspondence, communication, or other records in any form, including audio or video, between you or anyone acting on your behalf and the Saint Thomas Entities not previously produced in this litigation.

6. All statements obtained from or given by any person having knowledge of facts relevant to the subject matter of this lawsuit including without limitation the parties and other witnesses, and all documents containing or referring to any such statements.

7. Copies of any and all internet or other research performed by you regarding NECC or compounding pharmacies.

8. Please produce copies of the archive of your profile on all social media sites, including without limitation your Facebook Archive if you maintain a Facebook account.

9. Please produce copies showing all online comments that you have posted since September 1, 2012 on online news websites, blog posts, listserves, online forums, and discussion boards, whether by name, username, anonymously, or by pseudonym.

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